

The parameters of the Manomet Biomass Study were much too narrow to be of much use in the real world so it should either be thrown out or at least expanded upon.

These are some of the most serious flaws:

1. According to their own statistics, the most common harvesting in Massachusetts would be 11% better than coal and not 3% worse. But that's not the entire truth because the proposed biomass plants in Greenfield and Russell would also burn: roadside tree removals and power line prunings/trimmings as well as trimmings from power line maintenance; ground up stumps; and ground up old pallets. If this material is not burned, then it is usually buried somewhere where it decomposes releasing CO<sub>2</sub> and the much more powerful greenhouse gas methane. So this other biomass fuel source has a much higher "carbon dividend" which Manomet didn't account for which means the biomass plants have a much higher "carbon dividend" (much greater than 11%).

2. No mention of the tremendous positive silvicultural impacts on up to 2 million acres of private forest land. Better forest management means a greater "carbon dividend" as we increase growth rates on the better trees and accrue timber volume over time as has happened in the southern states.

Again I must stress that when foresters are given the opportunity to mark any and all junk wood and be able to sell it, then there is no excuse to high-grade any woodlot. We will be able to continue to repair the damage caused by 1/2 century of widespread DCR approved liquidation cuttings.

Biomass improvement cuttings not only improve growth rates of higher quality trees but we can improve species composition (more red oak, less red maple for example) and it can also be used to help facilitate much needed oak regeneration and to help control non-native invasive plants. Out west, there are over 50 million acres of overstocked forests due to ill advised fire suppression that will go up in flames eventually releasing tremendous amounts of carbon. But biomass improvement cuttings will reduce this risk. In MA, higher fire risk usually only occurs down at Myles Standish State Forest in SE MA.

Deforestation is one of the major sources of CO<sub>2</sub>, but by practicing good forestry everywhere, we will be encouraging more landowners to keep their land in forest rather than developing it thereby slowing down rates of deforestation. This is another huge "carbon dividend" that wasn't accounted for.

I have yet to hear from any anti-biomass activist how foresters are supposed to sell improvement cuttings and restore degraded woodlots if the pulp markets are extremely weak in this area and there are no big chipboard, waferboard, or composite wood markets around here to buy the chipwood. Firewood producers only want the straighter hardwood pole wood so they don't help anywhere near enough because what do we do with all the junk hardwood unsuitable for firewood, the softwood pulpwood, and big bully white pine for example? Biomass is the only hope we have.

3. No mention of the tremendous economic benefits in the Manomet report. The Greenfield and Russell biomass plants will create at least 500 new jobs!

So either fix the Manomet study or throw it out because it's totally useless in the real world. And we taxpayers paid \$200,000 for it!

So what must be done to promote more good forestry by expanding biomass markets?

1. Restore the state's Renewable Energy credit for biomass.
2. Help stop EPA's "Tailoring Rule" which will kill the biomass industry.
3. Put the proposed reforms to the Ch.132 Forest Cutting Law out to public hearings so we can stop liquidation cuttings once and for all. (We've been waiting over 3 years for these public hearings!!!)

Finally, I read with disbelief when MA DOER declared that "additional regulations may be needed to protect public values" while DCR has routinely issued permits for devastating liquidation cuttings over the last 1/2 century which has severely impacted species composition (red oak went from 30% to 20% while red maple went from 20% to 30% volume in the last 1/2 century according to FIA data) and greatly reduced timber quality and timber values which helped to cause a catastrophic decline in the number of sawmills in MA. So we would appreciate it if DOER could tell DCR to "protect public values" by not issuing any more permits for liquidation cuttings.

We've wasted enough time. There are lots of people out of work who need jobs! We have the forestry work so just build the biomass plants.

Mike Leonard, Consulting Forester